

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Section 43.62 Reporting Requirements for U.S.)	IB Docket No. 17-55
Providers of International Services)	
)	
2016 Biennial Review of Telecommunications)	IB Docket No. 16-131
Regulations)	
)	

JOINT COMMENTS OF SATCOM DIRECT, INC.,
SATCOM DIRECT COMMUNICATIONS, INC., AND COMSAT, INC.

Affiliates Satcom Direct, Inc., Satcom Direct Communications, Inc. and COMSAT, Inc. (collectively, “SD”), hereby submit these brief comments in the above-referenced Notice of Proposed Rulemaking proceeding.¹ SD supports the Commission’s proposal to eliminate the annual Traffic and Revenue Reports and further streamline the Circuit Capacity Reports. These reports are burdensome and collection of the data is a time-consuming process that SD estimates to take around 20 hours for all three entities. Given the size of SD in terms of both employees and revenue, the requirements put a substantial strain on our limited resources. Further resources are spent simply classifying services into the various reporting categories and analyzing the Commission’s instructions and rules. For innovative providers of non-traditional communications services like SD, these reporting requirements are overly burdensome, and represent a barrier to competition rather than furthering the Commission’s intended purpose of promoting competition.

¹ Section 43.62 Reporting Requirements for U.S. Providers of International Services; 2016 Biennial Review of Telecommunications Regulations, *Notice of Proposed Rulemaking*, 31 FCC Rcd 13785 (2017) (*Notice*).

Respectfully submitted,

SATCOM DIRECT, INC.

SATCOM DIRECT COMMUNICATIONS, INC.

COMSAT, INC.

/s/ Alexandra R. Simser

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